

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff

v.

Two Spider Monkeys (*Ateles Geoffroyi*
Vellerosus) - one male and one female,
Defendant *In Rem*.

CIVIL NO.: 25-1028 (CVR)

**UNITED STATES OF AMERICA'S MOTION FOR
DEFAULT DECREE OF FORFEITURE**

TO THE HONORABLE COURT:

COMES NOW plaintiff, United States of America, through the undersigned attorneys, and very respectfully states and prays:

1. The present civil action *In Rem*, filed on January 15, 2025, was brought to enforce the provisions of 16 U.S.C. §§ 3374(a)(1) and 3372(a)(2)(A). *See* ECF No. 1.
2. Starting on May 16, 2025, Notice of Civil Forfeiture was posted on an official government internet site (www.forfeiture.gov) for at least thirty (30) consecutive days, as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, announcing the government's intention to forfeit Defendant *In Rem*. Notice of Publication was filed on July 17, 2025. *See* ECF No. 8.
3. Service of process was sent to potential claimants Liza Ramos and Pablo Javier

Civil No.: 25-1028 (CVR)

Robles-Cortes and his attorney William White. Process Receipt and Return included herein as Exhibit “A”.

4. To date, no claims have been filed in response to the allegations set out by the verified complaint filed against Defendant *In Rem*. As such, the United States seeks entry of default and default judgment pursuant to Rule 55 of the Federal Rules of Civil Procedure.
5. Specifically, the United States respectfully requests that this Honorable Court enter a Default Decree of Forfeiture in the present case based on the fact that the complaint has not been answered and no claims have been filed as required by Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and thus, any future claim would be time-barred.

WHEREFORE, it is respectfully requested that a decree be entered by this Honorable Court declaring the forfeiture of two Spider Monkeys (*Ateles Geoffroyi Vellerosus*) - one male and one female in favor of the United States of America in accordance to law.

Civil No.: 25-1028 (CVR)

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of July 2025.

W. STEPHEN MULDROW
United States Attorney

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that; I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 17th day of July 2025.

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
Assistant United States Attorney